

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Tywane Jecleve HALL) Case No.
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 22, 2023 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

**Title 8 United States Code,
Section 1324**

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".

Continued on the attached sheet.

/S/ Aaron Kelly

Complainant's signature

Aaron Kelly, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/27/2023

Judge's signature

City and state: Laredo, Texas

Christopher dos Santos, U.S. Magistrate Judge

Printed name and title

UNITED STATES OF AMERICA
V.
Tywane Jecleve HALL

ATTACHMENT "A"

I, Aaron Kelly, a Homeland Security Investigations Special Agent, have knowledge of the following facts derived, in part, from either my personal observations, my training and experience, and/or information obtained from other agents and witnesses:

1. On November 22, 2023, at approximately 3:50 p.m., a Border Patrol Agent (BPA) was working his assigned duties at the primary inspection lane of the United States Border Patrol (USBP) Checkpoint at the 29-mile marker of Interstate Highway 35 north of Laredo, Texas in Webb County, when a white Freightliner tractor bearing Illinois license plate (P1163024) with a white trailer bearing Tennessee license plate (186165T) approached the primary inspection lane for an immigration inspection. BPA R. Martinez greeted the driver of the tractor-trailer later identified as Tywane Jecleve HALL. BPA Martinez asked HALL if he was the only occupant of the vehicle, to which HALL answered "YES." BPA Canine Handler G. Garcia and his service canine Dris (211063) conducted a free-air sniff along the exterior of the tractor-trailer when the service canine alerted to the presence of concealed humans or narcotics.
2. BPA Martinez instructed HALL to move into the passenger seat while BPA Martinez inspected the inside of the tractor due to the canine alert. Once inside the tractor, BPA Martinez noticed the sheets on the bottom bed appeared to have a person hiding under them. BPA Martinez removed the sheets from the bed and discovered five (5) individuals hiding underneath the sheets. BPA Martinez continued the inspection of the interior cabin of the tractor and discovered a total of sixteen individuals concealed inside the tractor. The sixteen individuals were taken into the USBP checkpoint station for further investigation, and it was determined that all sixteen individuals were present in the United States illegally with no legal documentation to be in or remain inside the United States.
3. During an interview with BPAs and Homeland Security Investigations (HSI) Special Agent (SA) Aaron Kelly, HALL was advised of his Miranda Rights and declined to make any further statements without legal counsel.
4. Agents interviewed Olga Marisela PORTILLO-Aragon as a material witness to the human smuggling event. PORTILLO-Aragon stated she was a citizen of Mexico who illegally entered the United States. PORTILLO-Aragon stated she made arrangements with a member of a human smuggling organization to pay a sum of money (\$12,000 U.S currency) to be transported into the United States and on to her final destination within the United States. PORTILLO-Aragon stated HALL was the driver of the tractor and HALL instructed her to lay down on the floor of the sleeper cabin. SA Kelly presented PORTILLO-Aragon with a six-pack photo array, and PORTILLO-Aragon positively identified HALL as the driver of the tractor. PORTILLO-Aragon stated once the tractor started moving, the tractor did not stop moving until it arrived at the USBP checkpoint.

[END]